

# EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

JOHN BARNHARDT, minor, by his  
mother and next friend, MRS.  
JULIA ANN BARNHARDT

THELMA COLE, minor, by her  
mother and next friend, MRS.  
DESSIE JEAN COLE

BERTHA CONLEY, CHARLES CONLEY  
and SYLVESTER CONLEY, minors,  
by their mother and next friend,  
MRS. BERTHA CONLEY

MILDRED CURRY and ROSIE MARIE  
CURRY, minors, by their mother  
and next friend, MRS. MILDRED  
CURRY

ANNIE PEARL DAVIS, JAMES MOORE,  
JOHNNIE WEAVER, PHYLLIS MOORE,  
and J. B. MOORE, minors by their  
mother and next friend, MRS.  
WILLIE MAE DAVIS

EMRIDGE FALCONER and SANDRA FALCONER,  
minors, by their mother and next  
friend, MRS. JOHNNYE V. FALCONER

FREDDY FIKES, JIMMY LEE FIKES,  
MARGIE FIKES and MARY FIKES, by  
their mother and next friend,  
MRS. LENOLIA FIKES

LAVALLE McCLINTON and GREGORY LAMAR  
McCLINTON, minors, by their mother  
and next friend, MRS. MARGIE FORD

BEVERLY ANNETTE FOY, minor, by her  
mother and next friend, MRS. EARTHA  
MAE FOY

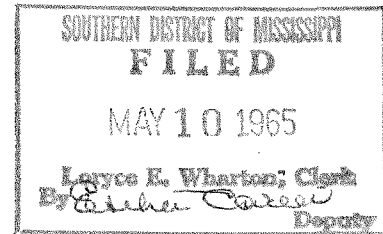
LENRAY GANDY, LARRY MARTIN and LANCE  
WILLIAMS, minors, by their mother and  
next friend, MRS. ROSALEE GANDY

LEVAN MOSLEY, CHARLIE GORDON and LARRY  
GORDON, minors, by their mother and  
next friend, MRS. MARY E. GORDON

EDITH HOPKINS, GABRIEL HOPKINS and  
LARRY HOPKINS, minors, by their  
mother and next friend, MRS.  
EMMA NELL GREEN

JIMMY DAVID GRIGGS, minor, by his  
mother and next friend, MRS.  
LEONA GRIGGS

EDWARD HELLEN, GLORIA ANN HELLEN  
and LARRY HELLEN, minors, by their  
mother and next friend, MRS.  
GERTRUDE HELLEN



ABBOT HENDERSON, ARTHUR HENDERSON,  
LEO ALLEN and ROY HENDERSON, minors,  
by their mother and next friend,  
MRS. CREOLA HENDERSON

ALVIS HICKS, CLARA HICKS, MELVIN  
HICKS and REGINALD HICKS, minors,  
by their mother and next friend,  
MRS. MARY HICKS

DORIS LEFLORE, GEORGETTE LEFLORE,  
HENDERSON LEFLORE and KAREN LEFLORE,  
minors, by their mother and next  
friend, MRS. ROSALEE LEFLORE

QUEEN ESTHER LLOYD and ROSE LLOYD,  
minors, by their father and next  
friend, MR. JOHN C. LLOYD

ANNELL MATTHEWS, DALE MATTHEWS,  
GAIL MATTHEWS and JERRY MATTHEWS,  
minors, by their mother and next  
friend, MRS. MARY L. MATTHEWS

JUANITA MOSLEY, MAURICE MOSLEY,  
MELVIN MOSLEY and WALTER MOSLEY,  
minors, by their mother and next  
friend, MRS. BERTHA MOSLEY

JULIA ODOMS, OSCAR ODOMS, RONALD  
ODOMS and ROSIE ODOMS, minors, by  
their mother and next friend,  
MRS. MARY FRANCIS ODOMS

JAMES JONES, ROSCOE JONES, minors,  
by their grandmother and next friend;  
and SAMUEL ROBINSON, minor, by his  
mother and next friend, MRS. JOHNNIE  
ROBINSON

MARGARET GLOVER, minor, by her  
guardian and next friend, MRS. AGNES  
AGNES SMITH,

Plaintiffs

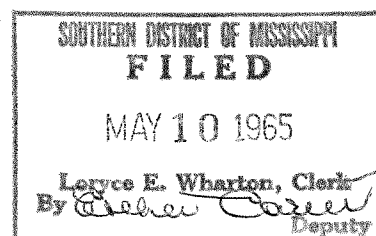
v.

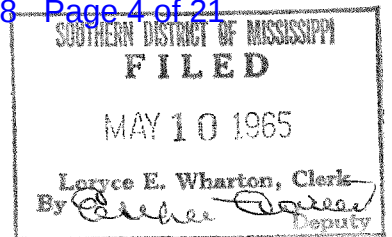
CIVIL ACTION

NO. 1300 (8)

MERIDIAN SEPARATE SCHOOL DISTRICT;  
DR. L. O. TODD, Superintendent of  
Education, DR. J. O. CARSON,  
Assistant Superintendent for  
Instruction; PAUL L. FRANKLIN,  
Assistant Superintendent for  
Business Affairs; MARVIN WILLIAMS,  
MRS. I. A. ROSENBAUM, JR.; OTHO  
R. SMITH, J. L. NORTHAM, JR.;  
ARCHIE McDONNELL, ELWOOD WILLIAMS  
and PHILLIP GARRISON, members  
of the Board of Trustees, their  
agents, successors, employees and  
all those in active concert  
with them,

Defendants.





# C O M P L A I N T

## I

The jurisdiction of this Court is invoked pursuant to Title 28, United States Code, Section 1343(3). This is a suit in equity authorized by law, Title 42, United States Code, §1983, to be commenced by any citizen of the United States or other persons within the jurisdiction thereof to redress the deprivation, under color of statute, ordinance, regulation, custom or usage of a State, of rights, privileges and immunities secured by the Constitution and laws of the United States.

## II

The jurisdiction of this Court is invoked to secure protection of rights, privileges and immunities and to redress deprivation of rights, privileges and immunities secured by the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution.

## III

This is a proceeding for a preliminary and permanent injunction enjoining The Meridian Separate School District, from continuing their policy, practice, custom and usage of operating compulsory biracial public school systems for the children residing in the City of Meridian, Mississippi.

## IV

The plaintiffs in this case are set forth below:

	<u>Minor Plaintiffs and Parents or Guardians</u>	<u>Age</u>	<u>Grade</u>	<u>School</u>
1.	John Barnhardt minors, by their mother and next friend, Mrs. Julia Ann Barnhardt	10	5	Wechsler
2.	Thelma Cole minor, by her mother and next friend, Mrs. Dessie Jean Cole	7	2	West End
3.	Bertha Conley	7	2	West End
4.	Charles Conley	9	4	West End
5.	Sylvester Conley minors, by their mother and next friend, Mrs. Bertha Conley	12	6	West End

<u>Minor Plaintiffs and Parents or Guardians</u>	<u>Age</u>	<u>Grade</u>	<u>School</u>
6. Mildred Curry	8	3	Wechsler
7. Rosie Marie Curry minors, by their mother and next friend, Mrs. Mildred Curry	6	entering 1	Wechsler
8. Annie Pearl Davis	13	7	Carver
9. James Moore	9	4	Mt. Barton
10. Johnnie Weaver	11	6	Mt. Barton
11. Phyllis Moore	7	1	Mt. Barton
13. J. B. Moore minors, by their mother and next friend, Mrs. Willie Mae Davis	5		Mt. Barton
14. Emridge Falconer	13	8	Magnolia
15. Sandra Falconer minors, by their mother and next friend, Mrs. Johnnye V. Falconer	17	11	Harris
16. Freddy Fikes,	10	5	Mt. Barton
17. Jimmy Lee Fikes	8	3	Mt. Barton
18. Margie Fikes	14	7	Carver
19. Mary Fikes minors, by their mother and next friend, Mrs. Lenolia Fikes	12	6	Mt. Barton
20. Lavalie McClinton	12	5	Park View
21. Gregory Lamar McClinton	11	4	Park View
22. minors, by their mother and next friend, Mrs. Margie Ford			
Beverly Annette Foy minor, by her mother and next friend, Mrs. Eartha Mae Foy	6	1	Mt. Barton
23. Lenray Gandy	9	4	Wechsler
24. Larry Martin	12	6	Wechsler
25. Lance Williams minors, by their mother and next friend, Mrs. Rosalee Gandy	7	2	Wechsler
26. Levan Mosley	13	3	Parkview
27. Charlie Gordon	10	3	Parkview
28. Larry Gordon minors, by their mother and next friend, Mrs. Mary E. Gordon	7	2	East End
29. Edith Hopkins	7	1	Wechsler
30. Gabriel Hopkins	9	3	Wechsler
31. Larry Hopkins minors, by their mother and next friend, Mrs. Emma Nell Green	10	3	Wechsler
32. Jimmy David Griggs minor, by his mother and next friend, Mrs. Leona Griggs	11	6	Wechsler
33. Edward Hellen	7	1	West End
34. Gloria Ann Hellen	5		
35. Larry Hellen minors, by their mother and next friend, Mrs. Gertrude Hellen	8	3	West End
36. Abbot Henderson	16	10	Harris
37. Arthur Henderson	14	8	Magnolia
38. Leo Allen	15	9	Magnolia
39. Roy Henderson minors, by their mother and next friend, Mrs. Creola Henderson	12	6	Park View

<u>Minor Plaintiffs and Parents or Guardians</u>	<u>Age</u>	<u>Grade</u>	<u>School</u>
40. Alvis Hicks	11	6	West End
41. Clara Hicks	7	2	West End
42. Melvin Hicks	9	3	West End
43. Reginald Hicks	10	5	West End
minors, by their mother and next friend, Mrs. Mary Hicks			
44. Doris Leflore	7	1	East End
45. Georgette Leflore	13	8	Magnolia
46. Henderson Leflore	12	7	Magnolia
47. Karen Leflore	4		
minors, by their mother and next friend, Mrs. Rosalee Leflore			
48. Queen Esther Lloyd	8	3	Wechsler
49. Rose Lloyd	13	8	Carver
minors, by their father and next friend, Mr. John C. Lloyd			
50. Annell Matthews	10	4	Wechsler
51. Dale Matthews	12	6	Wechsler
52. Gail Matthews	12	6	Wechsler
53. Jerry Matthews	13	7	Magnolia
minors, by their mother and next friend, Mrs. Mary L. Matthews			
54. Juanita Mosley	9	4	Mt. Barton
55. Maurice Mosley	6		
56. Melvin Mosley	18	12	Harris
57. Walter Mosley	21		
minors, by their mother and next friend, Mrs. Bertha Mosley			
58. Julia Odoms	15	6	Parkview
59. Oscar Odoms	13	5	Wechsler
60. Ronald Odoms	14	5	Wechsler
61. Rosie Odoms	16	6	Wechsler
minors, by their mother and next friend, Mrs. Mary Francis Odoms			
62. James Jones	16	11	Harris
63. Roscoe Jones	18	12	Harris
minors, by their grand- mother and next friend, Mrs. Johnnie Robinson			
64. Samuel Robinson	17	11	Harris
minor, by his mother and next friend, Mrs. Johnnie Robinson			
65. Margaret Glover	6	1	West End
minor, by her guardian and next friend, Mrs. Agnes Smith			



## V

Plaintiffs are all members of the Negro race. They bring this action on their own behalf and on behalf of all other Negro children and parents in the city of Meridian, Lauderdale County, Mississippi, who are similarly situated and affected by the policies, practices, customs and usages complained of herein. Plaintiffs are all citizens of the United States and of the State of Mississippi, residing in the City of Meridian, Lauderdale County, Mississippi. The minor plaintiffs and other minor Negro children similarly situated are eligible to attend and are presently attending public schools in the City of Meridian, Mississippi, which schools are under the jurisdiction, management and control of the defendants and which are all limited by defendants to attendance by Negro children, pursuant to the policy, practice, custom and usage of defendants of operating a compulsory biracial school system. The members of the class on whose behalf plaintiffs sue are so numerous as to make it impracticable to bring them all individually before this Court, but there are common questions of law and fact involved, common grievances arising out of common wrongs. A common relief is sought for each plaintiff and for each member of the class. The plaintiffs fairly and adequately represent the interest of the class.

## VI

Defendants in this case are The Meridian Separate School District, organized and existing under the laws of the State of Mississippi; Dr. L. O. Todd, County Superintendent of Education; Dr. J. O. Carson, Assistant Superintendent for Instruction; Paul L. Franklin, Assistant Superintendent for Business Affairs; Marvin Williams, Mrs. I. A. Rosenbaum, Jr., Otho R. Smith, J. L. Northam, Jr., Archie McDonnell, Elwood Williams and Phillip Garrison, members of the Board of Trustees.

## VII

Plaintiffs allege that defendants herein, acting under color of authority vested in them by the laws of the State of Mississippi, have pursued and are presently pursuing a policy, custom, practice

and usage of operating the public schools of the City of Meridian Lauderdale County, Mississippi, on a racially segregated basis. More particularly, plaintiffs allege that:

(a) the racially segregated school systems came into existence pursuant to the requirements of State law, and are presently continued, perpetuated and maintained by defendants as a matter of State law, policy, custom and usage:

(b) the Meridian Separate School District maintains 12 white secondary schools

- (1) Meridian High School
- (2) Kate Griffin Junior High School
- (3) Northwest Junior High School
- (4) Witherspoon School
- (5) Chalk School
- (6) Oakland Heights School
- (7) Poplar Springs School
- (8) West Hills School
- (9) South Side School
- (10) Marion Park School
- (11) Tuxedo School
- (12) Highland School

The defendant Board of Trustees also maintains one white junior college, The Meridian Junior College.

Each of these schools is limited to attendance by white pupils only and are staffed by white teachers, white principals and other white professional personnel and regardless of location, these schools may be attended by white pupils only.

(c) Defendant Meridian Separate School District also maintains seven Negro schools:

- (1) Carver Junior High School
- (2) Magnolia School
- (3) Parkview School
- (4) East End Elementary School
- (5) Mount Barton School
- (6) Wechsler School
- (7) West End Elementary School

Defendant Board also maintains one Negro junior college, Harris Junior College.

Each of these schools is limited to attendance by Negro pupils. They are staffed by Negro principals, Negro teachers and other Negro professional personnel. Regardless of location, these schools may be attended by Negro children only.

#### VIII

The assignment of professional personnel in the defendant school systems is determined solely by the race and color of the



children attending the particular school and the race and color of the personnel to be assigned.

# IX

Defendants assign pupils to schools in accordance with either a dual set of school zone lines or pursuant to policies, practices and procedures which result in all white children of elementary school age being assigned to white elementary schools and all Negro children of elementary school age being assigned to Negro elementary schools. All Negro elementary schools "feed into" the all Negro high schools while all white elementary schools "feed into" the all white high schools.

# X

All curricular and extra-curricular activities and school programs are conducted on a racially segregated basis, and plaintiffs allege and believe that the quality and quantity of such activities and of education generally as provided by the defendant Boards to plaintiffs and members of their class is highly inferior to that provided white children.

# XI

Budgets relating to school operation contain racial designations reflecting the compulsory biracial policy followed by defendants. All new construction plans proposed, adopted and executed by defendants are based upon the fact that there is in operation a compulsory biracial system of schools. All funds appropriated and expended by defendants are also appropriated and expended by defendants separately for Negro schools and separately for white schools.

# XII

The children attending white schools in the City of Meridian, Lauderdale County, Mississippi are provided a superior education by defendants than is offered to Negro children attending Negro schools:

(a) The scholastic program offered in the Negro schools is distinctly inferior to that provided in the white schools, and

is taught in schools inadequate in size and facilities. The average class size in Negro schools is much greater than an average class in white schools.

(b) White teachers are more highly trained than Negro teachers.

(c) White teachers are more highly paid than Negro teachers.

(d) More white teachers are provided per white child in attendance than per Negro child in attendance in the defendants' schools.

(e) More money is spent for instruction of white children than Negro children.

#### XIII

The defendants' policies, practices, customs and usages of racial segregation herein detailed are manifestations of a State policy to maintain racial segregation in the public schools, which policy is amply reflected in the Constitution and statutes of the State of Mississippi requiring segregation or aiding in the maintenance of segregation:

(a) Article 8, §207, Mississippi Constitution, requires maintenance of separate schools for white and colored children;

(b) §3841.3, Mississippi Code Annotated, authorizes the Attorney General to represent school officials in suits challenging validity of school operation;

(c) §4065.3, Mississippi Code Annotated, authorizes the entire executive branch to prohibit by all lawful means the racial integration of public schools and other public facilities;

(d) 6220.5, Mississippi Code Annotated, forbids attendance of whites with Negroes in any public schools of high school or lower level on penalty of fine, jail or both;

(e) §6334-11, Mississippi Code Annotated, forbids enrollment of children in any school except that to which assigned or transferred according to state statute.

## XIV

April 13, 1965, Negro parents residing in the City of Meridian, Mississippi, sent a letter and petition to Defendant Marvin Williams, chairman of Defendant Board of Trustees and Defendant Todd, Superintendent of Education of the City of Meridian stating that they are "extremely concerned that the City has as yet taken no steps to comply with the law by integrating its school system." The parents requested that the Board take immediate action to comply with the 1954 United States Supreme Court decision in Brown v. Board of Education. They also requested a meeting with the Board to discuss desegregation of the schools.

## XV

September 4, 1964, a number of Negro parents sought transfers for their children to "white" schools.

1. Plaintiff Mrs. Grace Lloyd attempted to transfer her daughter Queen Ester Lloyd to all white Highland Park School. No action was taken on her transfer application. (see attached affidavit of Mrs. Grace Lloyd).

2. Plaintiff Mrs. Margie Ford attempted to transfer her two children Gregory McClinton and Levalle McClinton to all-white Marion Park School. The white principal, Mrs. Parker Price, refused to accept the transfer application. (see attached affidavit of Mrs. Margie Ford).

3. Plaintiff Mrs. Julia Ann Barnhardt attempted to transfer her son Johnny Barnhardt to all white Chalk School. The principal refused to accept him (see attached affidavit of Mrs. Julia Ann Barnhardt).

4. Plaintiff Mrs. Emma Nell Green attempted to enroll her three children at Chalk School and was refused. (see attached affidavit of Mrs. Emma Nell Green.)

5. Plaintiff Mrs. Lenolia Fikes attempted to enroll her two children at all white Southside School. Her transfer applications were refused. (See attached affidavit of Mrs. Lenolia Fikes.)

6. Plaintiff Mrs. Agnes Smith attempted to enroll her daughter in Chalk School. She was refused. (See attached affidavit of Mrs. Agnes Smith.)

7. Mrs. Johnnye Falconer attempted to enroll her daughter at an all white high school and was refused. After questioning whether Mrs. Falconer and her husband lived together, a school official told Plaintiff Sandra Falconer "we cannot accept you in this school" and showed them out.

8. Ralph Darden and Artie Sims, Negro students in the City of Meridian on September 14, 1964, attempted to register at all white Kate Griffin Junior High School. They filled out transfer applications but were instructed that they could not be accepted. No explanation was given.

9. Mrs. Hilda Rimpson, a Negro citizen residing in the City of Meridian attempted to register her seven year old daughter at all white Whitherspoon School. The registrar refused to enroll the child. (See attached affidavit of Mrs. Hilda Rimpson.)

10. Several other Negro parents and pupils attempted to register at all white schools in September, 1964. All were refused.

#### XVI

Plaintiffs have not sought to utilize the provisions of the State Pupil Assignment Act as adopted in 1954, Mississippi Code Annotated, §§6334-01 - 6334-07, and submit that the exhaustion of remedies provided by this Act would prove futile and inadequate, in view of the State policy as illustrated by the State statutes detailed above and the policy of defendants, to provide the relief which plaintiffs seek here. Moreover, plaintiffs, by petitions and by prior transfer applications have placed defendant Board and defendant Superintendent of Education on notice of their desire to have the schools desegregated in the City of Meridian.

#### XVII

Plaintiffs and members of the class which they represent, are injured by the refusal of defendants to cease operation of a compulsory biracial school system in the City of Meridian, Lauderdale County, Mississippi. The operation of a compulsory biracial school system violates rights of the plaintiffs and members of their class which are secured by the Due Process and

and Equal Protection Clauses of the Fourteenth Amendment to the Constitution of the United States. The plaintiffs, and members of their class, are injured by the policy of assigning teachers, principals and other professional school personnel on the basis of the race and color of the person to be assigned and the race and color of the children attending a particular school. The injury which plaintiffs and members of their class suffer as a result of the operation of compulsory biracial school systems is irreparable and shall continue to irreparably injure plaintiffs and their class until enjoined by this Court. Any other relief to which plaintiffs and those similarly situated could be remitted would be attended by such uncertainties and delays as to deny substantial relief, would involve a multiplicity of suits, cause further irreparable injury and occasion damage, vexation and inconvenience, not only to plaintiffs and those similarly situated but to defendants as public officials.

WHEREFORE, plaintiffs respectfully pray that this Court advance this cause on the docket and order a speedy hearing of this action according to law and after such hearing enter a decree enjoining defendants, their agents, employees, successors, and all persons in active concert and participation with them from refusing to admit plaintiffs and all members of their class requesting such assignments to the nearest white school they are eligible to enter no later than the start of the 1965-66 school year; and further enjoin defendants from:

(a) continuing to maintain a dual scheme and/or pattern of school zone lines or attendance area lines based on race or color;

(b) operating a compulsory biracial school system in the City of Meridian, Lauderdale County, Mississippi;

(c) assigning pupils to schools in the City of Meridian, Lauderdale County, Mississippi, on the basis of race and color of the pupils;

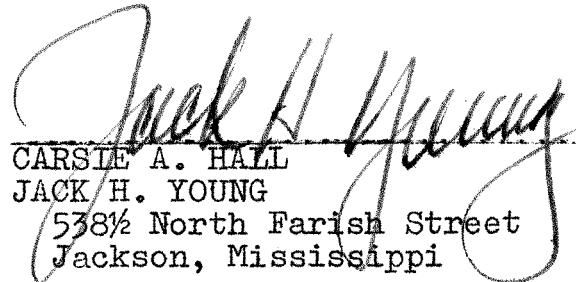
(d) assigning teachers, principals and other professional school personnel to the schools of the City of Meridian, Lauderdale County, Mississippi, on the basis of the race and color of the person to be assigned and the race and color of the children attending the school to which such personnel is to be assigned;



(e) approving budgets, making available funds, approving employment and construction contracts, and approving policies, curricula and programs which are designed to perpetuate or maintain or support compulsory racially segregated schools;

2. Plaintiffs pray that this Court will allow them their costs herein and grant such further, other, additional or alternative relief, including reasonable attorney's fees, as may appear to the Court to be equitable and just.

Respectfully submitted,

  
CARLIE A. HALL  
JACK H. YOUNG  
538½ North Farish Street  
Jackson, Mississippi

JACK GREENBERG  
DERRICK A. BELL, JR.  
MELVYN ZARR  
10 Columbus Circle  
New York, New York 10019

Attorneys for Plaintiffs

A F F I D A V I TSTATE OF MISSISSIPPI  
COUNTY OF LAUDERDALENAME Mrs. Grace Lloyd AGE 47ADDRESS 1818 30th Ave., MeridianOCCUPATION beautician PHONE 3-3139

Being duly sworn deposes and says: to wit: I am a citizen of the United States of America and am a Negro participant in civil rights and desegregation work.

On (day) Friday, (month) September, (date) 4, 1964, at about 8:30 time, the following happened:

I took my daughter, Queen Ester Lloyd, age 7, to register in the third grade at Highland Park School. The registrar had us fill out registration cards. She then asked ~~us~~ us if we had transfers. She told us we had to have a transfer. I asked her if we could bring the transfer back. She didn't answer, but said she would call us.

I then went to Wechsler Colored School where we got the transfer. I then took it over to Highland Park School and gave it to the same lady that waited on me the first time. She said that is what she wanted and that she accepted it.

Signed: Mrs. Grace LloydSworn to and signed before me this 4th day of September, 1964.

My commission expires:

Signed: Walter R. B. B. B.  
(notary public)Walter R. B. B. B.

A F F I D A V I TSTATE OF MISSISSIPPI  
COUNTY OF LAUDERDALENAME Margie Ford AGE 30ADDRESS 2128 22nd Ave. MeridianOCCUPATION housewife PHONE 54750

Being duly sworn deposes and says: to wit: I am a citizen of the United States of America and am a Negro participant in civil rights and desegregation work.

On (day) 4th, (month) September, (date) 1964, at  
about 8:30 a.m. time, the following happened:

We went over there, to Marion Park School. Johnnie Ruth Harris, my two kids, Gregory McClinton and Levalle McClinton, and myself. Shirley Fay Harris and Jacqueline Harris went along with me. We had to wait to see the principal. Her name is Mrs. Parker Price. She told me that I would have to have a transfer from Magnolia Jr. High before my kids could be registered, so we left. Dr. Moldovan told us that we did not need a transfer and sent us back. When we got back she told us that we would have to have a transfer and I told her that we didn't need a transfer since the schools were in the same district, and she told me that she could not accept us, and I asked her if she couldn't accept us because we didn't have the transfer. She said she couldn't accept us period. And we left.

Gregory is 10 years old and Lavelle is 12. When we entered the second time and advised Mrs. Price that we did not need the transfer, she wanted to know who told us this. We told her that the principal of Magnolia told us that. She said this was not so, that all schools have to have transfers before they accept children from other schools.

At 12:30 I went to Magnolia Jr. High and obtained a transfer for each of the children. I returned to the Marion Park School at approximately 2:00 p.m., and gave the transfers to Mrs. Price. She said, "I don't want this. Take these back where you got them from. I don't want them." "I don't want you at all." I asked her why? Was it because we were black? She said she didn't have anything to say, that she would make no comments, but that she would not enroll the children. Mrs. Price shouted these words so loudly that the police started to enter the building. It was apparent that he could hear her from the outside of the building.

Signed: Margie FordSworn to and signed before me this 4th day of September, 1964.

My commission expires:

Signed: Matthew P. Rankin  
(notary public)Mar. 8, 1968

A F F I D A V I T

STATE OF MISSISSIPPI  
COUNTY OF LAUDERDALE

NAME Julia Ann Barnhardt AGE 26

ADDRESS 3416 Davis Street, Meridian

OCCUPATION Housewife PHONE 35525

Being duly sworn deposes and says: to wit: I am a citizen of the United States of America and am a Negro participant in civil rights and desegregation work.

On (day) 4th, (month) September, (date) 1964, at  
about 8:30 a.m. time, the following happened:

I took my child, Johnny Barnhardt, age 10, to the Chalk School. The principal asked my little boy's name and what school did he go to last year. And they asked me my name and my husband's name and did I finish school and what grade did I stop in. And I told them I stopped in the 10th and they asked me the same thing about my husband and I told them he stopped in the 11th grade. And then she me "I can't accept you. That will be all. You are excused". I asked her why and she said "I have no further comment. You are excused." I then left.

I then went to the Superintendent of School's office and he asked me my name and I told him, and asked him what did I want to see him for. I told him I wanted to see him about getting my kid registered in school. He said "Well, I don't register them here in school". I told him that the principal of Chalk school had sent us here. He said "well I can't help you here," and then told his secretary to see us to the door. I said thank you and walked out.

Signed: Julia Ann Barnhardt

Sworn to and signed before me this 4th day of September, 1964.

My commission expires:

Signed: Marion E. Barnhardt  
(notary public)

March 8, 1968

A F F I D A V I T

STATE OF MISSISSIPPI  
COUNTY OF LAUDERDALE

NAME Emma Nell Green AGE 24

ADDRESS 3412 Davis St., Meridian

OCCUPATION Housewife PHONE 35525

Being duly sworn deposes and says: to wit: I am a citizen of the United States of America and am a Negro participant in civil rights and desegregation work.

On (day) 4th, (month) September, (date) 1964, at

about 8:30 time, the following happened:

I took my three children, Larry Hopkins, age 9, Gabriel Hopkins, age 9, Edith B. Hopkins, age 7 to the Chalk School. She, the principal, let me and two other women into a room. She wore a pin which indicated that she was the principal. She took the name, address, and previous school, information about my schooling. After talking to the other woman, she told me that my kids were not accepted. When I asked her why, she said she did not have another statement to make, That I would have to see the Superintendent of Schools. I then left.

I went to the Superintendent's office and told him what the principal had told me. He said, "No, she didn't tell you that. You must have misunderstood." "You don't have the necessary papers." I asked what papers I needed and he said I needed transfers. I told him okay and thank you. I left then.

Signed: Emma Nell Green

Sworn to and signed before me this 4th day of September, 1964.

My commission expires:

Signed: Walter L. L. L.

(notary public)

March 8, 1968



A F F I D A V I TSTATE OF MISSISSIPPI  
COUNTY OF LAUDERDALENAME Mrs. Lenolia Fikes AGE 35ADDRESS 1016 Royal Alley, MeridianOCCUPATION Housewife PHONE 3-6088  
32016

Being duly sworn deposes and says: to wit: I am a citizen of the United States of America and am a Negro participant in civil rights and desegregation work.

On (day) 4th, (month) September, (date) 1964, at about 8:30 time, the following happened:

Rev. Johnny Barbour and I, and my two children, Jimmy and Mary, age 8 and 12 respectively, went to the Southside School. The receptionist referred me to the Principal, who took me into her office. She went and got some cards and filled them out, asking the children's names, ages, and grade. After she taken my name and address, she told me to get a transfer from Mt. Barton School. I went back to Mt. Barton and the principal, Miss Robison, gave me the run around. She told me that she did not have any transfers and that I would have to wait and then she told me to go to an adjoining room from her office and told the lady who was with her to shut the door. I could hear her dialing the phone. Then she came into the room and said "I thought all the parents liked our school down here. What's wrong with our school?" I said it was all right but the Southside school is closer and the water gets up around Mt. Barton School. She said "If you get a transfer, you might transfer your children over there and they might not have enough room" I then told her that the principal of Southside school had told me to get a transfer. She then said that I might have to wait, and she did not know how long I would have to wait, it would probably be a half hour or more. I went outside to talk to my friends and when I returned she was writing out the transfers. I waited and then carried the transfers back to the Southside School, and the principal there told me she could not accept them, but said that she wanted to keep the transfers for future reference. I said thank you and left the transfers with her.

Signed: Mrs. Lenolia FikesSworn to and signed before me this 4th day of September, 1964.

My commission expires:

Signed: Walter B. Baird  
(notary public)March 8, 1968

A F F I D A V I TSTATE OF MISSISSIPPI  
COUNTY OF LAUDERDALENAME Mrs. Agnes Smith AGE 45ADDRESS 304 49th Ave., MeridianOCCUPATION housewife PHONE 3-1263

Being duly sworn deposes and says: to wit: I am a citizen of the United States of America and am a Negro participant in civil rights and desegregation work.

On (day) Friday, (month) September, (date) 4, 1964, atabout 8:30 time, the following happened:grandmother

I am the ~~mother~~ of Margaret Marcell Glover, who will be six years old in December. ~~When~~ I took her to register for first grade at the Chalk School. The principal of the school took my name and that of the child and our address. She then said, "I can not accept her. If you ~~want~~ want to know anything else you will have to see the superintendent." She said she would not give me any more information.

I then went to see Superintendent Todd. He asked me my name and the child's name. He told me she is not my child and asked me where the mother is. I told him she was in Fort Wayne, Indiana but that the child had been left with me and has always lived with me. He ~~said~~ said I could not send the child to school here in Meridian, but would have to send her to school up there. I said she lived ~~here~~ all her life and where was I to send her. He ~~said~~ said that was a problem. He asked me what school I took her to. I said Chalk. He said what school would I have taken her to if those people had not talked me into it. I said no one talked me into anything, I was bringing her to the nearest school. He repeated the question, what school would I really go to, and I told him to ~~in~~ whatever school was the nearest one, which I had gone to. Then he said, "Well I'm not registering." When I told him the principal sent me and I wanted to know whether she could go to Chalk School he said, "I don't have anything more to tell ~~me~~ you." When I asked him again he ~~said~~ said the same thing and so I left.

Signed: Mrs Agnes SmithSworn to and signed before me this 4th day of September, 1964.

My commission expires:

Signed: James R. Clark

(notary public)

March 2, 1968

A F F I D A V I TSTATE OF MISSISSIPPI  
COUNTY OF LAUDERDALENAME Mrs. Hilda Rimpson AGE 43ADDRESS 1313 5th Ave., MeridianOCCUPATION nurse's aid PHONE 483-2143

Being duly sworn deposes and says: to wit: I am a citizen of the United States of America and am a Negro participant in civil rights and desegregation work.

On (day) Friday, (month) September, (date) 4, 1964, at  
about 8:45 a.m. time, the following happened:

I took my daughter, **Sylvia** Rimpson, age 7, to register for the second grade at the Witherspoon School. As we approached the steps three white men were standing there. They would let the white students in, but blocked our entrance. We asked them to let us pass, but they said there are other doors and continued to block the path. A policeman then came up and told them to let us through which they then did do.

The registrar filled out a card with the child's name and address, age and grade. She then stood and said, "You know I can not register you." I asked why. She said that from where I live East End Colored School is nearest to me. We then left.

Signed: Mrs. Hilda RimpsonSworn to and signed before me this 4th day of September, 1964.

My commission expires:

Signed: [Signature]

(notary public)

March 8, 1968